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December 11, 2013

**VIA ECF**

The Honorable Lucy H. Koh  
United States District Court  
for the Northern District of California  
280 South First Street, #4050,  
Courtroom 8 – 4th Floor  
San Jose, CA 95113

Re: *In re High-Tech Employee Antitrust Litigation*,  
11-cv-2509-LHK (N.D. Cal.)

Your Honor:

We are Class Counsel in the above-referenced case and write to advise the Court on the status of Class notice.

As the Court is aware, since the October 21, 2013 hearing on Plaintiffs' Unopposed Motion for Preliminary Settlement Approval of the Settlements with Intuit, Lucasfilm Ltd., and Pixar, the Court certified a litigation class for claims against non-settling Defendants Adobe, Apple, Google, and Intel. In an effort to simplify communications with class members and to avoid the confusion and expense of multiple notice mailings, Class Counsel and counsel for settling Defendants have reached agreement on a proposed revised form of notice to advise class members of both the partial settlements with the three settling Defendants and the continuing litigation on behalf of a certified class against the four non-settling Defendants. The settling parties have shared the proposed revised notice with the non-settling Defendants for their consideration.

We expect to provide the Court with a draft of a proposed form of notice—which by that time will either have been agreed by all parties or will be limited to narrow issues of dispute—with our written submission for the Case Management Conference set for December 18. If the Court does not approve the revised proposed notice on the papers, we will be prepared to address any questions the Court may have about the revised proposed notice at the December 18 Conference.

Given that the current schedule for settlement approval requires notice to be mailed on December 16, 2013, we respectfully request that the Court continue the notice date to a date ten

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(10) days after the Court's approval thereof, with all other dates on the settlement calendar remaining the same. Plaintiffs' proposed order accompanies this submission.

Respectfully,

/s/

Joseph R. Saveri  
Joseph Saveri Law Firm

/s/

Kelly M. Dermody  
Lief Cabraser Heimann & Bernstein, LLP

cc: Non-Settling Defense Counsel (via email & ECF)  
David Kiernan, for Intuit (via email & ECF)  
Emily Henn, for Lucasfilm, Ltd. and Pixar (via email & ECF)